

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

BEIJING CHOICE ELECTRONIC )  
TECHNOLOGY CO., LTD., )  
Plaintiff, )  
Case No. 18-cv-00825  
v. )  
Honorable Sara L. Ellis  
CONTEC MEDICAL SYSTEMS USA INC. and )  
CONTEC MEDICAL SYSTEMS CO., LTD., )  
Magistrate Judge Maria Valdez  
Defendants.

**BEIJING CHOICE ELECTRONIC TECHNOLOGY'S  
MOTION FOR PROTECTIVE ORDER**

Plaintiff Beijing Choice Electronic Technology Co., Ltd. (“Choice”) respectfully requests that the Court enter the proposed protective order attached as Exhibit A, staying in effect until the parties negotiate and agree on a protective order. In support of this motion, Choice states as follows:

1. The proposed order is revised from the Court’s Form L.R. 26.2 Model Confidentiality Order, and Exhibit B is a redlined version of the proposed order, showing the revisions from the Model Confidentiality Order. The purpose of the revisions is to introduce a Highly Confidential Information designation in addition to the Confidential Information designation, to protect Choice’s highly confidential business information.
2. In connection with its Motion for Preliminary Injunction, Choice has provisionally filed under seal unredacted versions of its Memorandum in Support of Its Motion for Preliminary Injunction and Exhibit B (Tang Declaration), including Appendix 1 to Exhibit B (Choice’s sales, pricing, and revenue data), Exhibit H (email between Choice and its distributor), Exhibit K (Song Declaration), and Exhibit O (Zhan Declaration). The above items contain highly confidential business information on Choice’s sales, pricing, and revenue, Choice’s production capacity, Choice’s negotiations with its distributors, and Tianjin Chase Sun Pharmaceutical Co., Ltd.’s acquisition of Choice.
3. Because Choice and Defendants Contec Medical Systems USA Inc. and Contec Medical Systems Co., Ltd. (collectively, “Contec”) are direct competitors in the United States market for fingertip pulse oximeters, disclosure of this highly confidential business information could cause grave irreparable harm to Choice’s business.

WHEREFORE, Choice respectfully requests that the Court enter the proposed protective order attached as Exhibit A, and Choice will serve all the above papers on Contec's counsel once they have been retained and identified to Choice.

Respectfully submitted,

Dated: February 1, 2018

/s/ Steven P. Mandell

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*ATTORNEYS FOR PLAINTIFF  
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TECHNOLOGY CO., LTD.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 1, 2018 by U.S. Mail and Federal Express to:

**CONTEC MEDICAL SYSTEMS USA INC.    CONTEC MEDICAL SYSTEMS CO., LTD.**

111 Wheeling Rd, Wheeling, IL 60090	111 Wheeling Rd, Wheeling, IL 60090
and	and
1440 Chase Ave, Elk Grove Village, IL 60007	1440 Chase Ave, Elk Grove Village, IL 60007

*/s/ Steven P. Mandell* \_\_\_\_\_

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Stephen J. Rosenfeld  
MANDELL MENKES LLC

*ATTORNEY FOR PLAINTIFF  
BEIJING CHOICE ELECTRONIC  
TECHNOLOGY CO., LTD.*